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May 9, 2024

By ECF

Honorable Cathy Seibel  
United States District Judge  
United States Courthouse  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: United States v. Frank Butselaar  
22 Cr. 560 (CS)

Dear Judge Seibel:

I am writing, with the government's consent, to request an extension of time for Mr. Butselaar to file his Pretrial Motions from May 15, 2024, until May 31, 2024, and for the time for the Government's Response and Mr. Butselaar's Reply to be extended accordingly. The reason for the request concerns Mr. Butselaar's ability to review discovery.

As I have previously noted, the discovery in this case is overwhelming. The Government's initial production on January 18, 2024, contained approximately six million pages, which we were unable to review in earnest until March because it necessitated arranging a document review platform through the Defender Services Office. The Government made additional productions on March 13 and April 12, 2024, containing approximately 45GB of documents. Due to delivery delays and technical issues, these last two productions were first made available to Mr. Butselaar by Westchester County Jail only two days ago, on May 7, 2024. Mr. Butselaar's participation in discovery review is critical not only to help separate the wheat from the chaff, but because of the

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number of documents in Dutch, which number in the tens of thousands.<sup>1</sup> We are therefore requesting additional time to afford Mr. Butselaar at least a cursory review of the two most recent productions. For these reasons, we ask the Court to grant the following revised motion schedule:

- Mr. Butselaar's Pretrial Motions to be submitted by May 31, 2024;
- Government's Response to be submitted by July 2, 2024; and
- Mr. Butselaar's Reply to be submitted by July 16, 2024.

Thank you for your consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kerry A. Lawrence".

Kerry A. Lawrence

cc: All Counsel (via ECF)

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<sup>1</sup> According to the document review software provider, approximately 69,000 documents are in Dutch either in whole or in some part.